# UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	INDICTMENT CR13-14 PJS/FLN
Plaintiff,	)	(18 U.S.C. § 922(g)(1))
	)	(18 U.S.C. § 924(a)(2))
v.	)	(18 U.S.C. § 924(c)(1))
	)	(18 U.S.C. § 924(d)(1))
CHRISTOPHER LEE ROUSSEAU,	)	(18 U.S.C. § 924(e)(1))
	)	(18 U.S.C. § 924(g)(1))
Defendant.	)	(21 U.S.C. § 841(a)(1))
	)	(21 U.S.C. § 841(b)(1)(C))
	)	(28 U.S.C. § 2461(c))

THE UNITED STATES GRAND JURY CHARGES THAT:

# COUNT 1

(Possession with Intent to Distribute Methamphetamine)

On or about December 3, 2012, in the State and District of Minnesota, the defendant,

# CHRISTOPHER LEE ROUSSEAU,

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

## COUNT 2

(Carrying a Firearm in Relation to a Drug Trafficking Crime)

On or about December 3, 2012, in the State and District of Minnesota, the defendant,

### CHRISTOPHER LEE ROUSSEAU,

did knowingly use and carry a firearm, namely, a Rohm GMBH .22 caliber revolver, bearing serial number 158167, during and in relation to a drug trafficking crime for which he may be prosecuted

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in a court of the United States, that is, possession with intent to distribute methamphetamine, as described in Count 1 above, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

#### COUNT 3

(Armed Career Criminal in Possession of a Firearm)

On or about December 3, 2012, in the State and District of Minnesota, the defendant,

# CHRISTOPHER LEE ROUSSEAU,

having previously been convicted of three or more crimes punishable by imprisonment for a term exceeding one year, namely:

CHARGE	LOCATION	CONVICTION DATE (on or about)
Fleeing Police in a Motor Vehicle	Pine County, MN	April 6, 2007
Aid/Abet Burglary 2nd Degree	Ramsey County, MN	February 1, 2011
Fleeing Police in a Motor Vehicle	Ramsey County, MN	April 8, 2011
Burglary 3rd Degree	Dakota County, MN	April 12, 2011

thereafter did knowingly and unlawfully possess, in and affecting interstate and foreign commerce, a firearm, namely: a Rohm GMBH .22 caliber revolver, bearing serial number 158167, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

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#### COUNT 4

(Armed Career Criminal in Possession of Ammunition)

On or about December 3, 2012, in the State and District of Minnesota, the defendant,

# CHRISTOPHER LEE ROUSSEAU,

having been previously convicted of three or more crimes punishable by imprisonment for a term exceeding one year, namely:

CHARGE	LOCATION	CONVICTION DATE (on or about)
Fleeing Police in a Motor Vehicle	Pine County, MN	April 6, 2007
Aid/Abet Burglary 2nd Degree	Ramsey County, MN	February 1, 2011
Fleeing Police in a Motor Vehicle	Ramsey County, MN	April 8, 2011
Burglary 3rd Degree	Dakota County, MN	April 12, 2011

did knowingly possess in and affecting interstate commerce 2 rounds of .22 caliber ammunition, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

# FORFEITURE ALLEGATIONS

Counts 1-4 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c), and Title 21, United State Code,

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Section 853(a).

Upon conviction of Count 1 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendant obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations, including the firearm and ammunition described below.

Upon conviction of Counts 2-4 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), all his right, title and interest in any firearm or ammunition involved in or used in any knowing violation of Sections 922(g) and 924(e)(1), including:

- i. one Rohm GMBH .22 caliber revolver, bearing serial number 158167; and
- ii. 2 rounds of .22 caliber ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1), 924(c)(1)(A)(i), 924(d)(1), and 924(e)(1), Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 853(a), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON